

**Georgia Pacific Corp.  
Port Hudson Operations  
Zachary, East Baton Rouge Parish, Louisiana  
Agency Interest Number: 2617**

**Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services**

**STATEMENT OF BASIS**

**Georgia Pacific Corp.  
Port Hudson Operations  
Zachary, East Baton Rouge Parish, Louisiana  
Agency Interest Number: 2617  
Activity Number: PER20060001  
Proposed Permit Number: 0840-00010-V3**

**I. APPLICANT**

**Company:**  
Georgia-Pacific Corp.  
PO Box 430  
Zachary, Louisiana 70791

**Facility:**  
Port Hudson Operations  
1000 W Mount Pleasant Rd  
Zachary, East Baton Rouge Parish, Louisiana  
Approximate UTM coordinates are 665.0 kilometers East and 3391.0 kilometers North, Zone 15

**II. FACILITY AND CURRENT PERMIT STATUS**

Georgia Pacific owns and operates a bleached kraft fine paper and tissue mill near Zachary, in East Baton Rouge Parish. The mill, known as the Port Hudson Operations, has been in operation since the before 1969.

The mill operates under various air permits, PSD-LA-544(M-1), PSD-LA-581(M-2), and 0840-00010-V2. This Part 70 operating permit is for all emission points at the mill and includes provisions of Permit PSD-LA-544(M-1) and PSD-LA-581(M-3).

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### **III. PROPOSED PROJECT/PERMIT INFORMATION**

#### **Application**

A permit application was submitted for the Port Hudson Operations on April 13, 2006, requesting a permit modification. Additional information dated December 1, 2006, January 12, 2007, and February 7, 2007 was also received.

#### **Project**

This modification includes updates to the No. 6 CFB Boiler project including design changes to the materials handling system, the addition of a larger pet coke/limestone baghouse (EPN 168) to replace several smaller ones, the addition of an ash filter separator vent (EPN 169), the addition of a biomass fuel handling system (EPN 170), the addition of tire-derived fuel as an additional alternative fuel for the No. 6 CFB boiler, sulfuric acid emissions from the No. 6 CFB Boiler, an increase in the methanol throughput, revisions to the No. 3 Bleach Plant to correct the permitted throughput, corrections and clarifications to specific requirements, and changes to the CAM plan for the Material and Ash Handling System Baghouses and Vent Filters.

Port Hudson Operations is located in a marginal ozone nonattainment area and is a major source under Nonattainment New Source Review (NNSR) provisions, LAC 33:III.504. Potential increases in NO<sub>x</sub> and VOC emissions (without respect to decreases) from affected sources are below 5 TPY; accordingly, a netting analysis, which considers emissions resulting from any physical or operational change at the facility, is not required.

#### **Proposed Permit**

Permit 0840-00010-V3 will be a minor modification of Part 70 operating permit 0840-00010-V2 for the Port Hudson Operations.

#### **Permitted Air Emissions**

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM <sub>10</sub>	823.43	824.71	+1.28
SO <sub>2</sub>	1807.31	1807.31	-
NO <sub>x</sub>	2220.93	2220.93	-
CO	4676.30	4676.80	+0.50
VOC	881.68	881.99	+0.31

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#### IV REGULATORY ANALYSIS

The applicability of the appropriate regulations is straightforward and provided in the Specific Requirements section of the proposed permit. Similarly, the Monitoring, Reporting and Recordkeeping necessary to demonstrate compliance with the applicable terms, conditions and standards are also provided in the Specific Requirements section of the proposed permit.

##### Applicability and Exemptions of Selected Subject Items

ID No:	Requirement	Notes
AI 2617 Facility-Wide	Emission Standards for Particulate Matter LAC 33:III.Chapter 13	Exempt per LAC 33:III.1301.B. Does not apply to the wood pulping industry.
	Waste Gas Disposal LAC 33:III.2115	Does Not Apply. Meets exemption 2115.H.1.d
5 - Combination Boiler No. 1 (Receives HVLC vents)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	Limit SO <sub>2</sub> emissions to ≤ 2000 ppmv Subsumed by BACT
	Control of Emissions of Nitrogen Oxides (NOx) LAC 33:III.2201.C.16	Wood-fired boilers that are subject to 40 CFR 60, Subpart Db are exempt from the provisions of this regulation.
	Chemical Wood Pulping Industry LAC 33:III.2301.D.1.d	Maintain PM ≤ 0.6 lb/MM BTU heat input Subsumed by BACT
7, 8, 9 Smelt Dissolving Tanks	Control of Emission of Smoke LAC 33:III.1101.B	Maintain opacity ≤ 20% Subsumed by 40 CFR 63 Subpart MM. Comply with corrective action requirements of 63.864(k)(1)(ii). Violations shall be determined according to 63.864(k)(2)(iii).
10- Lime Kiln No. 1 (Receives LVHC vents)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	Exempt per LAC 33:III.1503.C
	Chemical Wood Pulping Industry LAC 33:III.2301	2301.D.1.c, Maintain PM ≤ 1.0 lb per eq. pulp ton 2301.D.3.d, TRS ≤ 20 ppmv @ 10% O <sub>2</sub> , Subsumed by BACT
	NSPS Subpart BB 40 CFR 60.282(a)(3), 283(a)(5), 284(a)(42)	Shall maintain PM ≤ 0.067 gr/dscf while burning gaseous fossil fuel and 0.13 gr/dscf when liquid fossil fuel is burned. TRS ≤ 8 ppmvd @ 10% O <sub>2</sub> , with allowance for excess emissions in a quarter up to 1% of time PM and TRS limits subsumed by BACT

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ID No:	Requirement	Notes
10- Lime Kiln No. 1 (Receives LVHC vents)	NESHAP for pulp and paper industry 40 CFR 63.860(b)(1) Subpart MM	Comply with 63.862(1)(i)(C). Existing kraft lime kiln must not exceed a PM concentration in exhaust gases > 0.064 g/dscf (corrected to 10% O <sub>2</sub> ) to the atmosphere. PM limit subsumed by BACT. Comply with corrective action requirements of 63.864(k)(1)(ii). Violations shall be determined according to 63.864(k)(2)(iii).
	Control of Emission of Smoke LAC 33:III.1101.B	Maintain opacity ≤ 20% Subsumed by 40 CFR 63 Subpart MM. Comply with corrective action requirements of 63.864(k)(1)(i). Violations shall be determined according to 63.864(k)(2)(ii).
11 - Lime Kiln No. 2 (Receives LVHC vents)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	Exempt per LAC 33:III.1503.C
	Chemical Wood Pulping Industry LAC 33:III.2301	2301.D.1.c, Maintain PM ≤ 1.0 lb per eq. pulp ton 2301.D.3.d, TRS ≤ 20 ppmv @ 10% O <sub>2</sub> , Subsumed by BACT
	NSPS Subpart BB 40 CFR 60.282(a)(3), 283(a)(5), 284(a)(42)	Shall maintain PM ≤ 0.067 gr/dscf while burning gaseous fossil fuel and 0.13 gr/dscf when liquid fossil fuel is burned. TRS ≤ 8 ppmvd @ 10% O <sub>2</sub> , with allowance for excess emissions in a quarter up to 1% of time PM subsumed by MM; TRS limits subsumed by BACT
	Control of Emission of Smoke LAC 33:III.1101.B	Maintain opacity ≤ 20% Subsumed by 40 CFR 63 Subpart MM. Comply with corrective action requirements of 63.864(k)(1)(i). Violations shall be determined according to 63.864(k)(2)(ii).
27 - Power Boiler No. 5 (Receive HVLC vents)	Emission Standards for Sulfur Dioxide LAC 33:III.1503	Exempt per 1503.C
	Control of Emission of Smoke LAC 33:III.1101.B	Maintain opacity ≤ 20% Subsumed by 40 CFR 60 Subpart D
	NSPS Subparts D for boilers 40 CFR 60.42(a), 60.44(a)(1)	Maintain NO <sub>x</sub> ≤ 0.20 lbs/MM BTU, Subsumed by BACT Maintain opacity ≤ 20% PM ≤ 0.10 lbs/MM BTU
39 - Methanol Storage Tank	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	MACT is not required for methanol (Class III TAP)

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ID No:	Requirement	Notes
40-WWT System 42-45 Paper Machines 47-Slakers/Causticizers 49- Batch Digester Fill	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	Exempt. MACT is not required until permitting authority makes a final determination of MACT for this equipment per LAC 33:III.5105.B.8
48A, 48B Heavy Black Liquor Storage	Storage of VOC LAC 33:III.2103	Does not apply Vapor Pressure < 1.5 psia
50A, 50B, 50C, 50D, 50E, 50F, 52, 55A, 55B, 55C, 56A, 56B, 56C, 61, 74, 75, 79A, 79B, 79C, 79D, 82, 83, 84, 85A, 85B, 86, 87, 88A, 88B, 89, 154	Storage of VOC LAC 33:III.2103	Does not apply Vapor Pressure < 1.5 psia
	NSPS Subpart Kb for VOL tanks 40 CFR Part 60.110b	Does not apply. Does not meet the definition of a storage vessel because this source is a process tank.
63 - Gasoline Tank	NSPS Subparts K, Ka, Kb for VOL tanks 40 CFR Part 60	Do not apply Volume < 10,500 gallons
67A, 67B, 103-Landfills 68,69,70-Dryer Hood, Vacuum Pump, Scrubber	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	Exempt. MACT is not required until permitting authority makes a final determination of MACT for this equipment per LAC 33:III.5105.B.8
72, 73 - Recovery Furnaces No. 1 & 2	Control of Emission of Smoke LAC 33:III.1101.B	Maintain opacity $\leq 20\%$ Subsumed by 40 CFR 63 Subpart MM. Comply with corrective action requirements of 63.864(k)(1)(i). Violations shall be determined according to 63.864(k)(2)(ii).
	Emission Standards for Sulfur Dioxide LAC 33:III.1503	Limit SO <sub>2</sub> from the stack gas to $\leq 2000$ ppmv Subsumed by BACT
	Chemical Wood Pulping Industry LAC 33:III.2301	Maintain PM <sub>10</sub> $\leq 4.0$ lbs per eq. pulp ton and TRS $\leq 5$ ppmv @ 8% O <sub>2</sub> . Subsumed by BACT Maintain opacity $\leq 40\%$ . Subsumed by NSPS Subpart BB
93 and 94 Knotters	NESHAP Subpart S 40 CFR 63.440	Exempt per 40 CFR 63.443(a)(1)(ii).
	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	Exempt. MACT is not required until permitting authority makes a final determination of MACT for this equipment per LAC 33:III.5105.B.8
80,81-Paper Machines 105,110,113-Vacuum Pump, Converting Pulp, Fugitives	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	Exempt. MACT is not required until permitting authority makes a final determination of MACT for this equipment per LAC 33:III.5105.B.8
106, 107, TAD TM No. 6 Exhausts	Emission Standards for Sulfur Dioxide LAC 33:III.1503	Exempt per LAC 33:III.1503.C

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108, TM No. 6 Mist Elimination System	Emission Standards for Particulate Matter LAC 33:III.1301	Does not apply per LAC 33:III.1301.B
	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	MACT is not required until permitting authority makes a final determination of MACT for this equipment per LAC 33:III.5105.B.8
109, TM No. 6 Dust Collection System	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	MACT is not required until permitting authority makes a final determination of MACT for this equipment per LAC 33:III.5105.B.8
111 No 6TM Yankee Aircap Exhaust	Emission Standards for Sulfur Dioxide LAC 33:III.1503	Exempt per LAC 33:III.1503.C
114 Converting Equipment Fugitives	Controlling Emissions from Printing Processes 40 CFR 63 Subpart KK 63.824(b)(2), 63.829(e)(2), and 63.830(b)(1)	Subject only to recordkeeping. Applies less than 400 kg/month of organic HAP.
117 - Wet Strength Storage Tank	Storage of VOC LAC 33:III.2103	Does not apply Vapor Pressure < 1.5 psia
130 No. 6 CFB Combination Boiler	Acid Rain Program Permitting [LAC 33:III.505] [40CFR Parts 72]	Exempt pursuant to LAC 505.A2.e.ii.. Not an affected unit subject to the Acid Rain Program; Supplies less than one-third potential output to any utility distribution system
	Control of Emission of Smoke [LAC 33:III.1101]	Emission of smoke shall be controlled so that shade is not darker than 20 percent opacity, except for one 6-minute period in any 60 consecutive minutes. Subsumed by 40 CFR Subpart DDDDD.
	Emission Standards for Sulfur Dioxide [LAC 33:III.1503.C]	SO <sub>2</sub> concentration not to exceed 2,000 ppmv on average in stack gas over 3-hour period. Subsumed by 40 CFR 60 Subpart Db.
	Comprehensive Toxic Air Pollutant Emission Control Program [LAC 33:III.5109]	EXEMPT. Emissions from the combustion of virgin fossil fuels and wood residue fuels are exempt from MACT.
	Control of Emissions of NO <sub>x</sub> [LAC 33:III.2201.C.15]	EXEMPT. Source is a wood-fired boiler subject to 40 CFR 60 Subpart Db.
149- Process Cooling Tower	National Emission Standards for Hazardous Air Pollutants for Industrial Process Cooling Towers [40 CFR 63, Subpart Q]	DOES NOT APPLY. The new cooling tower will not use chromium-based water treatment chemicals.
158, 159 Sulfuric Acid Tank 1, Sulfuric Acid Tank 2	Storage of Volatile Organic Compounds LAC 33:III.2103	DOES NOT APPLY. Tank does not store VOCs.
	NSPS Subpart Kb for VOL tanks 40 CFR Part 60.110b	DOES NOT APPLY. Tank does not store VOL.
	Comprehensive TAP Emission Control Program, LAC 33:III.5109 - State Only	MACT is not required for Sulfuric Acid (Class III TAP). Shall comply with Ambient Air Standard.

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ID No:	Requirement	Notes
158, 159 Sulfuric Acid Tank 1, Sulfuric Acid Tank 2	NESHAP Subpart S 40 CFR 63.440	EXEMPT. Source emits no HAPs.

**Prevention of Significant Deterioration/Nonattainment Review**

This modification was below the significance level for PSD review.

**MACT Requirements**

Georgia Pacific meets MACT requirements by complying with NESHAP Part 63 Subpart DDDDD for the boilers; Subpart MM for recovery furnaces, smelt dissolving tanks, and lime kilns; and Subpart S for the pulping and bleaching systems. The proposed project will comply with the appropriate MACT requirements.

**Air Quality Analysis**

This is a minor modification and no air quality analysis is required.

**General Condition XVII Activities**

The facility will comply with the applicable General Condition XVII Activities emissions as required by the operating permit rule. However, General Condition XVII Activities are not subject to testing, monitoring, reporting or recordkeeping requirements. For a list of approved General Condition XVII Activities, refer to the Section VIII – General Condition XVII Activities of the proposed permit.

**Insignificant Activities**

All Insignificant Activities are authorized under LAC 33:III.501.B.5. For a list of approved Insignificant Activities, refer to the Section IX – Insignificant Activities of the proposed permit.

**V. PERMIT SHIELD**

The proposed permit does not contain a permit shield.

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## **VII. GLOSSARY**

**Carbon Monoxide (CO)** – A colorless, odorless gas, which is an oxide of carbon.

**Maximum Achievable Control Technology (MACT)** – The maximum degree of reduction in emissions of each air pollutant subject to LAC 33:III.Chapter 51 (including a prohibition on such emissions, where achievable) that the administrative authority, upon review of submitted MACT compliance plans and other relevant information and taking into consideration the cost of achieving such emission reduction, as well as any non-air-quality health and environmental impacts and energy requirements, determines is achievable through application of measures, processes, methods, systems, or techniques.

**Hydrogen Sulfide (H<sub>2</sub>S)** – A colorless inflammable gas having the characteristic odor of rotten eggs, and found in many mineral springs. It is produced by the reaction of acids on metallic sulfides, and is an important chemical reagent.

**New Source Review (NSR)** – A preconstruction review and permitting program applicable to new or modified major stationary sources of air pollutants regulated under the Clean Air Act (CAA). NSR is required by Parts C (“Prevention of Significant Deterioration of Air Quality”) and D (“Nonattainment New Source Review”).

**Nitrogen Oxides (NO<sub>x</sub>)** – Compounds whose molecules consist of nitrogen and oxygen.

**Organic Compound** – Any compound of carbon and another element. Examples: Methane (CH<sub>4</sub>), Ethane (C<sub>2</sub>H<sub>6</sub>), Carbon Disulfide (CS<sub>2</sub>)

**Part 70 Operating Permit** – Also referred to as a Title V permit, required for major sources as defined in 40 CFR 70 and LAC 33:III.507. Major sources include, but are not limited to, sources which have the potential to emit: ≥10 tons per year of any toxic air pollutant; ≥25 tons of total toxic air pollutants; and ≥100 tons per year of regulated pollutants (unless regulated solely under 112(r) of the Clean Air Act) (25 tons per year for sources in non-attainment parishes).

**PM<sub>10</sub>** – Particulate matter with an aerodynamic diameter less than or equal to a nominal 10 micrometers as measured by the method in Title 40, Code of Federal Regulations, Part 50, Appendix J.

**Potential to Emit (PTE)** – The maximum capacity of a stationary source to emit any air pollutant under its physical and operational design.

**Prevention of Significant Deterioration (PSD)** – A New Source Review permitting program for major sources in geographic areas that meet the National Ambient Air Quality Standards (NAAQS) at 40 CFR Part 50. PSD requirements are designed to ensure that the air quality in attainment areas will not degrade.



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Sulfur Dioxide (SO<sub>2</sub>) – An oxide of sulfur.

Sulfuric Acid (H<sub>2</sub>SO<sub>4</sub>) – A highly corrosive, dense oily liquid. It is a regulated toxic air pollutant under LAC 33:III.Chapter 51.

Title V Permit – See Part 70 Operating Permit.

Volatile Organic Compound (VOC) – Any organic compound, which participates in atmospheric photochemical reactions; that is, any organic compound other than those, which the administrator of the U.S. Environmental Protection Agency designates as having negligible photochemical reactivity.